

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA**

1. GREAT LAKES INSURANCE SE,)
vs.)
Plaintiff,)) Case No. CIV-22-00702-JD
vs.)) Judge Jodi W. Dishman
vs.)
2. FREDY VALLE d/b/a VALLE)
TRUCKING;)
3. SILVER STAR CONSTRUCTION)
COMPANY, INC.;)
4. TYLON MACKEY;)
5. ISRAEL JUAREZ; 5:22-CV-00702-JD)
6. ORD TRUCKING, INC.)
7. ZURICH AMERICAN INS. CO.,)
vs.)
Defendants,)
-----)
8. ZURICH AMERICAN INS. CO.,)
vs.)
Defendant/Third Party)
Plaintiff,)
vs.)
9. PROGRESSIVE NORTHERN INS.)
CO.,)
vs.)
Third-Party Defendant.)

**DEFENDANT/THIRD-PARTY PLAINTIFF ZURICH AMERICAN INSURANCE
COMPANY'S OBJECTIONS TO PLAINTIFF'S FINAL EXHIBIT LIST**

Defendant/Third-Party Plaintiff Zurich American Insurance Company (“ZAIC”), pursuant to the Court’s Scheduling Order (Doc. No. 56), respectfully submits its Objections to Plaintiff’s Final Exhibit List.

OBJECTIONS TO EXHIBITS

No.	Description	Objection
1.	Insurance Policy issued to Valle Trucking by Great Lakes	No objection.
2.	Reservation of Rights issues to Valle Trucking	No objection.
3.	Reservation of Rights issued to Silver Star	No objection.
4.	First contact letter from Great Lakes to Valle Trucking	No objection.
5.	Notice of claim from Zurich Insurance	No objection.
6.	Official Oklahoma Traffic Collision Report	No objection.
7.	Deposition of Israel Juarez	Federal Rules of Evidence 801, 803
8.	Hauling Agreement between Silver Star and Valle Trucking	No objection.
9.	Letter from J Chris Horton to Jeffrey Curran re Demand for Defense	No objection.
10.	Insurance Policy issued to Silver Star by Zurich Insurance	No objection.
11.	Insurance Policy issued to Valle Trucking by Progressive	No objection.
12.	Pleadings, discovery documents, and file of Underlying Lawsuit	Not identified with sufficient specificity to allow for objections at this time. Objection reserved until produced.
13.	Complaint, Initial Disclosures, as filed	Not a proper exhibit. Federal Rules of Evidence 401, 402, 403, 801, 803
14.	Discovery responses produced by Defendants, to the extent not objected to by Plaintiff	Not identified with sufficient specificity to allow for objections at this time. Objection reserved until produced.
15.	Demonstrative timeline of relevant events and communications	Not identified with sufficient specificity to allow for objections at this time. Objection reserved until produced.
16.	Additional exhibits identified during remaining discovery, to the extent not objected to by Plaintiff	Not identified with sufficient specificity to allow for objections

No.	Description	Objection
		at this time. Objection reserved until produced.
17.	Exhibits identified by Defendant, to the extent not objected to by Plaintiff	Not identified with sufficient specificity to allow for objections at this time. Objection reserved until produced.

Respectfully Submitted,

ASTON | MATHIS | CAMPBELL PLLC

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CERTIFICATE OF SERVICE

I, Amy E. Hampton, hereby certify that on this 25th day of September, 2023, a true and correct copy of the foregoing document was served upon the following via the Court's electronic notification system:

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